

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Telephone Number Portability)	CC Docket No. 95-116

COMMENTS OF NENA

The National Emergency Number Association (“NENA”) hereby replies to the comments of others in the Further Notice in the docket.¹ In our opening comments, we discussed potential 9-1-1 call routing problems associated with wireline to wireline and wireless to wireline porting across rate center boundaries. We observed, for example, that:

Porting to a wireline service provider within the borders of a selective router currently serving the rate center associated with the NPA-NXX will not have the negative impacts discussed above. However, routing borders usually do not track LATA boundaries or other regulatory borders beyond rate centers. Thus it is difficult to predict the consequences of a particular port across a rate center boundary, except through case-by-case analysis. (Comments, 3)

After reviewing the comments of others, we tentatively conclude that:

- Negative impacts on 9-1-1 calling could be minimized by limiting porting to new wireline service (whether from wireless or wireline carriers) to the boundaries of the LATA in which the rate center for the old NXX is found.
- Wider porting is estimated, conservatively, to cost \$150 million and would take four years or longer to complete the needed 9-1-1 equipment changes necessary to prevent serious degradation in E9-1-1 services available to wireline customers.
- Should the Commission accept the recommendation of BellSouth (Comments, 9),

¹ FCC 03-284, released November 10, 2003. Time to reply was extended to February 4th, by Order, DA 03-4059, released December 22, 2003.

NENA is ready to discuss in detail with FCC specialists the implications for 9-1-1 call completion of porting across rate center boundaries.

Preparation for Wider Porting

SBC (Comments, 4-6) summarizes improvements potentially needed to achieve, without 9-1-1 degradation, any change in the current rate center affiliation for all porting involving at least one wireline provider:

- ❑ Upgrading Public Safety Answering Point (“PSAP”) equipment to handle additional digits;
- ❑ Upgrading the trunks between 9-1-1 selective routers and PSAPs; and
- ❑ Implementing SS7 protocol for end office to selective router trunks to handle the additional digits.

We would add one other improvement to the SBC list: Upgrade or replacement of some selective routers which have a four-area code limit today. (NENA Comments, 2)

Sprint (Comments, 11-12) suggests that foreign exchange (“FX”) service could be used for porting outside the rate center. Unfortunately, that is not a fail-safe solution. We concur with BellSouth (Comments, 16) that there may be a PSAP “mismatch” resulting in delayed response to an emergency call. FX 9-1-1 calls may end up at the wrong PSAP and the call or information might have to be transferred manually to another PSAP.

We also agree with BellSouth (Comments, 8) that porting without rate center restriction, can cause 9-1-1 default routing to fail, because the wrong selective router may be chosen to send the call through, *i.e.* a router not connected to the needed PSAP.

AT&T (Comments, 3) states there are no technical impediments for wireless to wireline porting so long as it takes place within a LATA. Many 9-1-1 selective routers (“SRs”) today follow LATA borders for their coverage areas. However, there may be multiple routers within a

LATA. Also, a router may serve or overlap multiple LATAs. In those instances where a selective router's borders are also a LATA's borders, it is possible that the upgrades we have listed will not be needed and there will be no significant negative impact on 9-1-1 requiring major financial expenditures.

The issues are complex and variable. We appreciate BellSouth's suggestion (Comments, 9) that

before the Commission finalizes any decision regarding intermodal porting across rate center, BellSouth recommends that the Commission's LNP and E911 subject matter experts discuss in detail the E911 Implications and seek input from the National Emergency Number Association.

NENA would be pleased to assist further in any way that would be useful to the FCC.

Cost Estimates

It is important to realize that certain upgrade expenses may be required if even one or a few local wireline service providers are allowed to port beyond the rate center in some instances and/or beyond the LATA in others. If the Further Notice resolution were to give wireline carriers a choice depending upon their individual capabilities, the financial 9-1-1 impacts would be the same. Upgrades would be needed to accommodate the few as well as the many.

We conservatively estimate that it would cost \$150 million to perform the four upgrades listed above. We also estimate that such changes would take four years or more to implement fully and properly across the country. This estimate is based on information compiled in 2002-03 by the NENA SWAT (Strategic Wireless Access Team) initiative technical study group and verified by additional review in recent weeks.

We used data developed in the SWAT Tech Team on costs to upgrade PSAP equipment to support 10 digit ANI (Enhanced MF), or to replace PSAP CPE where it could not be

upgraded; changing SR-to-PSAP trunking to EMF; implementing SS7 for end office to SR trunking where not in place as of 2003; and changing SR software to support more than four NPAs for a total of 440 SRs. We did not include in the \$150M minimum nationally software costs to change the service order processes in LECs to support the related upgrades.

Intermodal Porting Interval

NENA is active in a NANC study group asked to report to the North American Numbering Council ("NANC") and the FCC in the near future. We have drafted a 9-1-1 section for that report generally aligned with our previous public comments. We are concerned that "mixed service" -- those periods where a porting customer's old and new carrier accounts are active -- be reduced to the minimum feasible interval.

Respectfully submitted,

NENA

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